

ORIGINAL



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ADMITTED TO PRACTICE IN:
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NEVADA, TEXAS, WYOMING,
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November 21, 2001

Nancy Cole, Supervisor
Document Control
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

Re: Arizona Public Service Company
Docket No. E-01345A-01-0822

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AZ CORP COMMISSION
DOCUMENT CONTROL

Dear Ms. Cole:

Enclosed for filing in the above-captioned proceeding are the original and fifteen (15) copies of an Application for Leave to Intervene by the Arizona Public Service. Enclosed also, are two additional copies to be conformed and returned to our office in the self-addressed stamped envelope enclosed for your convenience.

Please let me know if you have any questions, and thank you for your assistance.

Sincerely,

Lawrence V. Robertson, Jr.

LVR:cl
enclosures

Arizona Corporation Commission

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ORIGINAL INTERVENTION

BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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2001 NOV 26 P 12:02

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY

WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

MARC SPITZER

Commissioner

IN THE MATTER OF ARIZONA
PUBLIC SERVICE COMPANY'S
REQUEST FOR A VARIANCE OF
CERTAIN REQUIREMENTS OF A.A.C.
R14-2-1606

DOCKET NO. E-01345A-01-0822

APPLICATION FOR LEAVE TO
INTERVENE

Pursuant to A.A.C. R14-3-105, Sempra Energy Resources ("Sempra") by and through its undersigned attorney, hereby makes application for leave to intervene in the above-captioned proceeding as a party of record.

I.

Sempra is a corporation organized under the laws of the State of California, and is qualified to do business in the State of Arizona. Sempra is engaged in the development and operation of electric generation facilities, and the sale of electricity at wholesale in the competitive market in several western states. In Arizona, Sempra has been authorized by the Arizona Power Plant and Transmission Line Siting Committee and the Commission to site and construct a 1250 megawatt (nominal) electric generation facility for such purpose. [Decision No. 63232; Case No. 101] That facility is known as the Mesquite Power Station, and it is currently under construction near the community of Arlington in Maricopa County, Arizona.

II.

By means of its October 18, 2001, Request for a Variance of Certain Requirements of A.A.C. R14-2-1606 ("Request"), Arizona Public Service Company ("APS") seeks in effect to withdraw a

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1 substantial portion of its Standard Offer customers' future generation requirements from the
2 competitive wholesale electric market intended to be created through the Commission's electric
3 competition rules. It is that same market into which Sempra could offer for sale electricity generated
4 at the Mesquite Power Station. As a consequence, Sempra would be directly and substantially
5 affected by any order of the Commission granting in whole or in part APS's request.
6

7 III.

8 Sempra's participation will not unduly broaden the issues raised by APS's Request.
9 Moreover, while the instant proceeding may address certain issues of an industry- wide nature, no
10 other party is capable of adequately and fully representing Sempra's specific interests herein.
11

12 WHEREFORE, Sempra hereby requests that its Application for Leave To Intervene be
13 granted and it be accorded full rights of participation a party of record in the above-captioned
14 proceeding.
15

16 DATED this 21 day of November, 2001.

17 Sempra Energy Resources

18 By: Lawrence V. Robertson, Jr.
19 Lawrence V. Robertson, Jr.
20 Attorney for Applicant

21 The original and fifteen (15) copies
22 of the foregoing Application for
23 Leave to Intervene was mailed to
24 Docket Control this 21st day of
25 November, 2001, to:

26 Nancy Cole, Supervisor
27 Docket Control
28 Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

1 A copy of the of the foregoing
2 Application for Leave to Intervene
3 was mailed on this 21st day of
4 November, 2001, to:

5 Thomas L. Mumaw
6 Jeffery B. Guldner
7 Snell & Wilmer
8 One Arizona Center
9 400 E. Van Buren
10 Phoenix, Arizona 85004-2202

11 Christopher Kempley
12 Chief Counsel
13 Arizona Corporation Commission
14 1200 West Washington
15 Phoenix, Arizona 85007
16 